

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

BROADCAST MUSIC, INC.;)	
BLACK ICE PUBLISHING; SONGS OF)	
UNIVERSAL, INC.; RONDOR MUSIC)	
INTERNATIONAL, INC. d/b/s IRVING)	
MUSIC; COTILLION MUSIC, INC.)	
d/b/a PRONTO MUSIC;)	
UNIVERSAL-SONGS OF POLYGRAM)	
INTERNATIONAL, INC.; PEER)	
INTERNATIONAL CORPORATION;)	
UNIVERSAL MUSIC MGB NA LLC d/b/a)	
UNIVERSAL MUSIC CAREERS;)	
SONY/ATV SONGS LLC; R AND R)	
NOMAD PUBLISHING COMPANY,)	
A division of R & R NOMAD PUBLISHING)	
CO. LLC; 4U2ASKY ENTERTAINMENT)	
INC.,)	
)	
Plaintiffs,)	CIVIL ACTION NO.: 18-3043-CV-S-BP
)	
V.)	
)	
MOON CITY, LLC d/b/a GALLOWAY)	
STATION; ERMONI GREINKE and)	
KLAUS GREINKE, each individually,)	
)	
Defendants.)	

DEFENDANTS' ANSWER TO PLAINTIFFS' COMPLAINT

COME NOW, Defendants, by and through their undersigned counsel, and for their Answers to Plaintiff's Complaint, state and aver as follows:

1. Defendants admit this action purports to arise under the laws cited, but are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 1 of the Complaint, and therefore deny the same.

2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 2 of the Complaint, and therefore deny the same.
3. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 3 of the Complaint, and therefore deny the same.
4. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 4 of the Complaint, and therefore deny the same.
5. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 5 of the Complaint, and therefore deny the same.
6. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 6 of the Complaint, and therefore deny the same.
7. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 7 of the Complaint, and therefore deny the same.
8. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 8 of the Complaint, and therefore deny the same.
9. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 9 of the Complaint, and therefore deny the same.

10. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 10 of the Complaint, and therefore deny the same.
11. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 11 of the Complaint, and therefore deny the same.
12. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 12 of the Complaint, and therefore deny the same.
13. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 13 of the Complaint, and therefore deny the same.
14. Defendants are without knowledge or information sufficient to form a belief as to the truth of paragraph 14 allegations, and therefore deny the same.
15. Defendants admit the allegations contained within paragraph 15 of the Complaint.
16. Defendants deny all allegations contained within paragraph 16 of the Complaint.
17. Defendants admit the allegations contained within paragraph 17 of the Complaint.
18. Defendants admit Ermioni Greinke is a member of Moon City, LLC, but otherwise deny the remaining allegations contained within paragraph 18 of the Complaint.
19. Defendants admit Ermioni Greinke is an owner of Moon City, LLC, but otherwise deny the remaining allegations contained within paragraph 19 of the Complaint.
20. Defendants deny the allegations contained within paragraph 20 of the Complaint and, by further way of pleading, affirmatively state that Klaus Greinke is deceased.

21. Defendants deny the allegations contained within paragraph 21 of the Complaint and, by further way of pleading, affirmatively state that Klaus Greinke is deceased.

CLAIMS OF COPYRIGHT INFRINGEMENT

22. Defendants incorporates by reference, as if fully set forth herein, its response to paragraphs 1 through 21 of Plaintiff's Complaint.

23. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 23 of the Complaint, and therefore deny the same.

24. Defendants are without knowledge or information sufficient to form a belief as to what Plaintiffs subjectively "allege," and therefore deny all allegations contained within paragraph 24 of the Complaint.

25. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations contained within paragraph 25 of the Complaint, and therefore deny the same. By further way of pleading, Defendants specifically deny the authenticity, veracity, and admissibility as of the attached schedule.

26. Defendants incorporate by reference their response to paragraph 25 above and deny all allegations contained within paragraph 26 of the Complaint.

27. Defendants incorporate by reference their response to paragraph 25 above and deny all allegations contained within paragraph 27 of the Complaint.

28. Defendants incorporate by reference their response to paragraph 25 above and deny all allegations contained within paragraph 28 of the Complaint.

29. Defendants incorporate by reference their response to paragraph 25 above and deny all allegations contained within paragraph 29 of the Complaint.

30. Defendants incorporate by reference their response to paragraph 25 above and deny all allegations contained within paragraph 30 of the Complaint. By further way of pleading, Defendants affirmatively state that they have no intention of committing any acts of copyright infringement and therefore no injunction is justified or necessary.

WHEREFORE, having answered fully Plaintiff's Complaint, Defendants pray the same be dismissed with prejudice to the reinstatement thereof, or for judgment as a matter of law in favor of Defendants, for a reasonable award of attorney's fees in favor of Defendants, for all costs of the underlying action to be taxed against Plaintiffs, and for any other and further relief as the Court deems just and proper in the premises.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served by electronic notice or by United States Mail, First Class postage prepaid, this 21st day of June, 2018, to:

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